

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

NANCY E. LEWEN	:	Civil Action No. 1:17-cv-148 SBP
Plaintiff,	:	Judge Susan Paradise Baxter
	:	
v.	:	
	:	
BARBARA RAYMOND	:	
Defendant.	:	

**MOTION FOR LEAVE TO FILE CONCISE STATEMENT OF UNDISPUTED
MATERIAL FACTS**

AND NOW, comes Defendant by and through her counsel who respectfully submit this Motion for Leave to File Concise Statement of Undisputed Material Facts, and respectfully submit the following:

1. On April 3, 2020, a Case Management Order was issued where Defendant's Motion for Summary Judgment was due on June 12, 2020. See ECF (112).
2. On June 10, 2020, Defendant filed her Motion for Summary Judgment and Brief in Support of Summary Judgment with attached exhibits. See ECF (113-115).
3. In reviewing the docket, Defendant did not attach the Concise Statement of Undisputed Material Facts. This was an oversight on the part of undersigned counsel.
4. Defendant respectfully requests leave to attach the Concise Statement of Undisputed Material Facts.
5. Defendant does not believe this request will prejudice Plaintiff nor otherwise delay the case.

WHEREFORE, it is respectfully requested that Defendant be granted leave to file the Concise Statement of Undisputed Material Facts

Respectfully submitted,

/s/ Anna Zalewski
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Date: June 15, 2020